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**From:** Rebecca Hollis [rhollis@cleanenergysystems.com]  
**Sent:** 10/15/2020 6:24:41 PM  
**To:** Ho, Yenhung [Ho.Yenhung@epa.gov]  
**CC:** Albright, David [Albright.David@epa.gov]; Natalie Nowiski [NNowiski@slb.com]; Vivian Rohrback [VRohrback@slb.com]; Shari.Ring@cadmusgroup.com  
**Subject:** RE: EPA's Technical Evaluation Comments and Information Request #3 for CES Class VI permit application

Thank you for the prompt and detailed response! This helps and we will proceed accordingly.

Best Regards,  
-Rebecca

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**From:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Sent:** Thursday, October 15, 2020 10:29 AM  
**To:** Rebecca Hollis <rhollis@cleanenergysystems.com>  
**Cc:** Albright, David <Albright.David@epa.gov>; Natalie Nowiski <NNowiski@slb.com>; Vivian Rohrback <VRohrback@slb.com>; Shari.Ring@cadmusgroup.com  
**Subject:** RE: EPA's Technical Evaluation Comments and Information Request #3 for CES Class VI permit application

Hi Rebecca,

Yes, the intent was to document both the injection and post injection phase events. This would provide a more complete picture of the occurrence of any emergency events and how they were addressed throughout the totality of the project. It is envisioned that this might include things such as:

- Identification of previously unidentified well(s) within the AoR
- Detection of CO2 or other unanticipated parameters above the confining zone
- Any divergence from planned operational parameters
- Changes to the understanding of site characterization
- Evidence of induced seismic event(s)
- Non-compliance with any permit condition, any event that triggers an unscheduled AoR reevaluation, or an emergency event

Let us know if you have more questions.

Best regards,  
Calvin

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**From:** Rebecca Hollis <rhollis@cleanenergysystems.com>  
**Sent:** Wednesday, October 14, 2020 5:24 PM  
**To:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** Albright, David <Albright.David@epa.gov>; Natalie Nowiski <NNowiski@slb.com>; Vivian Rohrback <VRohrback@slb.com>  
**Subject:** RE: EPA's Technical Evaluation Comments and Information Request #3 for CES Class VI permit application

Hi Calvin,

Thank you for the EPA's Technical Evaluation Comments and Information Request #3, discussing the submitted Operating Procedures and Area of Review (AoR).

We have reviewed the letter and Enclosures and believe we understand and can address EPA's comments. I would however, like to ask one clarifying question on a comment in Enclosure 2 (regarding the AoR Delineation Modeling

Approach). Specifically, the last bullet point of the final section of "Non-Endangerment Demonstration Criteria." This section refers to post-injection site care and site closure plan, but the last recommendation requests a table of "any emergencies or other unanticipated events that may occur during the injection and post-injection phases."

Is EPA requesting examples for both injection and post-injection, even though the document focuses on the post-injection phase?

Thank you again and please don't hesitate to reach out.

Regards,  
-Rebecca

**Rebecca Hollis**  
**Director Business Development -**



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*The Power to Reverse Climate Change*

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**From:** Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>

**Sent:** Wednesday, October 7, 2020 9:45 AM

**To:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>

**Cc:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>

**Subject:** EPA's Technical Evaluation Comments and Information Request #3 for CES Class VI permit application

Hi Rebecca,

Today, we have sent you another technical evaluation comments and information request (#3) via the Information Request module of GSDT. Let us know if you have any questions about the request.

Sincerely,

Calvin Ho  
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Water Division (WTR-4-2)  
U.S. EPA Region 9  
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San Francisco, CA 94105  
415-972-3262